



# CALIFORNIA CHAMBER of COMMERCE

December 17, 2004

**VIA ELECTRONIC MAIL**

Dr. John Faust  
Senior Toxicologist  
Office of Environmental Health  
Hazard Assessment  
1515 Clay Street, 16<sup>th</sup> Floor  
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**Re: Cal/EPA EJ Action Plan Implementation: California Chamber of Commerce Preliminary Comments regarding the Definition of “Multi-media Cumulative Impacts”**

Dear Dr. Faust:

The California Chamber of Commerce (Chamber) is the largest broad-based business advocate in California representing over 14,000 businesses that employ one-fourth of the private sector workforce in the state. Seventy-Five percent of Chamber members employ fewer than one hundred employees. Following are the Chambers comments regarding the definition of “Multi-media Cumulative Impacts” under Cal/EPA’s Environmental Justice Action Plan (Action Plan).

The Chamber believes that it is appropriate for environmental justice programs to clearly define terms to ensure all stakeholders have a consistent and clear understanding of Agency policies.

Multi-media cumulative Impacts should be defined as follows:

“Multi-media Cumulative Impacts” means the adverse health risk posed by exposure to pollutants from multiple pollution sources.

This definition is comprehensive and it is consistent with OEHHA's guidance on health risk assessment capturing both cancer and noncancer risks. The definition is broad enough to allow for consideration of paths of exposure from air, water, food and soil, and the toxicity of pollutants involved. Additionally it is consistent with Cal/EPA's commitment to conduct cumulative impacts efforts with a strong scientific foundation.

It has come to my attention that some groups have recommended that social factors such as lack of health insurance, crime, emotional distress or dilapidated housing to name a few should be included in the definition. By inclusion in the definition there is a tacit implication that Cal/EPA may be able to mitigate or resolve those social issues. While these issues are real, they certainly fall outside of the scope of this task and cannot be resolved by Cal/EPA and therefore there is no benefit to including these factors in the definition of "multi-media cumulative impacts."

The Chamber appreciated your consideration of these comments and recognizes the difficult task at hand. I look forward to working with in the future activities related to environmental justice. If you need to contact me regarding these comments you can reach me at 916.930.1265.

Regards,

Bruce A. Magnani  
Legislative Advocate  
California Chamber of Commerce

Via Electronic Mail

cc: The Honorable Dr. Alan Lloyd, Agency Secretary, CAL/EPA  
The Honorable James Branham, Undersecretary, CAL/EPA  
The Honorable Dr. Joan Denton, Director, Office of Environmental Health Hazard Assessment  
Ms. Tam Doduc, Deputy Secretary for Environmental Quality, CAL/EPA